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Class Counsel for the Settlement Classes

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE DYNAMIC RANDOM ACCESS
MEMORY (DRAM) ANTITRUST
LITIGATION

Master File No. M-02-1486 PJH

MDL No. 1486

**DECLARATION OF ROBIN
NIEMIEC IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION TO AUTHORIZE
DISTRIBUTION OF SETTLEMENT
FUND**

This Document Relates To:

Preis v. Hitachi, Ltd., et al.,
Case No. CV 10-0346 PJH

Time: 9:00 a.m.
Date: March 26, 2014
Judge: Hon. Phyllis J. Hamilton
Courtroom: 3, 3rd Floor

1 I, Robin Niemiec, declare:

2 1. I submit this Declaration in order to provide the Court and the parties to the
3 above-captioned litigation with information regarding the dissemination and processing of the
4 Proof of Claim Form ("Claim Form") and allocation and distribution of the Net Settlement Fund
5 (the "Fund") to the Settlement Class. I am over 21 years of age and am not a party to this action.

6 2. Pursuant to the Order Granting Class Certification and Preliminary Approval of
7 Class Action Settlements with Mitsubishi, Hitachi, and Toshiba May 12, 2010 ("Preliminary
8 Approval Order"), Rust Consulting, Inc. ("Rust") was appointed the Class Administrator. Rust
9 has overseen, among other things, the process of providing notice about the Settlement and
10 Claim Forms to potential Class Members, processing, evaluating and auditing completed Claim
11 Forms submitted to Rust ("Claims"), calculating the *pro rata* share for each Class Member who
12 filed a valid Claim, and distributing the Fund.

13 3. I am a Client Services Director for Rust and have personal knowledge of the facts
14 set forth herein, and if called as a witness, could and would testify competently hereto.

15 **Claims Processing Activities**

16 4. A Claim Form was designed so that the consumers could easily fill out the
17 information required. The two page Claim Form describes the reimbursement eligibility
18 requirements; provides detailed instructions for filling out the Claim Form and key definitions of
19 terms; and lists contact information for the Claims Administrator for additional questions from
20 potential Class Members.

21 5. Pursuant to the Court's Order Granting Class Certification and Preliminary
22 Approval of Class Action Settlements with Mitsubishi, Hitachi and Toshiba, on June 23, 2010,
23 Rust mailed the Notice and Claim Form ("Claim Form") to 668,758 potential Class Members and
24 electronically mailed a summary of the Notice ("Email Notice"), with a link to file a claim online,
25 to 392,776 entities.

26 6. The Notice informed potential Class Members that the plan of allocation provides
27 for distribution of the Net Settlement Fund on a *pro rata* basis, based on the dollar amount each
28

1 class member paid to defendants for direct purchases of DRAM from April 1, 1999 to June 30,
2 2002.

3 7. Of the 392,776 Email Notices sent, 65,080 emails were returned as undeliverable.
4 A total of 65,080 Claim Forms were mailed by standard first-class U.S. mail, postage prepaid, to
5 the physical addresses of those records that had undeliverable emails.

6 8. An additional 49 Claim Forms were mailed by standard first-class U.S. mail,
7 postage prepaid to entities at their request.

8 9. The USPS returned 2,983 Claim Forms as undeliverable with a forwarding
9 address. Rust has subsequently re-mailed 2,983 Claim Forms to the addresses provided by the
10 USPS.

11 10. The USPS returned 94,553 Claim Forms as undeliverable without a forwarding
12 address. Rust utilized the services of a trace processing company seeking updated addresses for
13 potential Class Members whose Claim Forms were returned as undeliverable. Rust received
14 52,237 updated addresses and subsequently re-mailed 52,237 Claim Forms to the updated
15 addresses.

16 11. Rust has acted as a repository for inquiries and communications from potential
17 Class Members. To this extent Rust established a Post Office Box and a toll-free telephone
18 number to respond to potential claimants' inquiries. Rust also created and maintained a website
19 (www.dramantitrustsettlement.com) which made available the Settlement Agreements, First,
20 Second and Amended Preliminary Approval Orders, the Notices, Summary Notices and Claim
21 form. In additional, a claimant could file its Claim Form online at the website from June 23,
22 2010 through February 28, 2012.

23 12. Potential Class Members also had the opportunity to file a Claim online.
24 Claimants could use their Claimant ID # (provided on the Notice)¹ or file online without using a
25 Claimant ID #.

26
27
28 ¹ If a Claimant used their Claimant ID#, the name and address was pre-populated with an opportunity to modify the address.

1 13. Pursuant to the May 12, 2010 Order, the Claim Form filing deadline was
2 December 3, 2010.

3 14. Rust received and processed 9,283 timely and late Claim Forms from potential
4 Class Members ("Claimants"). Of the 9,283 Claim Forms received, filed, and processed, 2,873
5 were paper Claim Forms and 6,410 Claim Forms were filed online.

6 15. The value of the Claims received was in excess of \$3.9 billion.

7 16. For quality control purposes, each paper Claim Form was sequentially stamped
8 upon receipt with a unique number ("Claim Number"). The paper Claim Forms were grouped in
9 batches of 50 in the order in which it was processed by Rust's mailroom staff and each batch of
10 Claims was numbered sequentially.

11 17. The online Claim Form was also given a Claim Number at the time the Claim was
12 filed online and the purchase information, as well as any contact information supplied by the
13 Claimant, was entered directly into the DRAM-Additional Settlements database.

14 18. Rust reviewed each submitted Claim Form to determine whether it was valid and
15 included all required information.

16 19. Claim Forms were filed by 8,366 individuals. Rust was advised that no
17 individual made direct purchases from the Defendants. As such, these Claims were rendered
18 ineligible and beginning on February 11, 2011, Notices of Ineligibility were mailed. An
19 example of the Notice of Ineligibility is attached as Exhibit A.

20 20. Of the 8,366 Claims filed by individuals, 11 were later rendered eligible because
21 the Claimant responded to the Notice of Ineligibility showing proof of direct purchases or it was
22 determined the Claim was filed by a company rather than an individual.

23 21. Of the remaining Claims, Rust reviewed each submitted Claim Form to date to
24 determine if any Claim Form was duplicative of any other Claim Form.

25 22. Rust identified 42 duplicate Claim Forms.

26 23. Beginning February 24, 2011, Rust mailed a Notice of Ineligibility to Claimants
27 whose Claims were determined to be ineligible because they were duplicative of previously filed
28

1 Claims or contacted the Claimant via email or telephone. These Claimants were given the
2 opportunity to dispute this determination and provide proof in support of their position, to which
3 one responded and that Claim was rendered eligible. An example of the Notice of Ineligibility is
4 attached as Exhibit B.

5 24. An additional 82 Claims were rendered ineligible because:

- 6 • it was written on the Claim Form that no purchases were made;
- 7 • the Claimant withdrew their Claim; or
- 8 • the Claimant used their Claim Form to request exclusion.

9 25. As a result of communications with Claimants, Rust was advised that two Claim
10 Forms contained purchases not made from the Defendants. These two Claims were rendered
11 ineligible and a Notice of Ineligibility was mailed on March 29, 2012. An example of the Notice
12 of Ineligibility is attached as Exhibit C.

13 26. After excluding ineligible Claims, Rust determined that certain Claim Forms were
14 missing information, in whole or in part, that was required to confirm the validity of such Claim
15 and necessary to calculate a Claimant's *pro rata* share.

16 27. Rust determined that one Claim Form was not signed and 121 did not contain
17 purchase information.

18 28. Beginning February 18, 2011, letters were sent to Claimants advising them that
19 their Claim was deficient/ missing information and requesting a correction of the defect
20 ("Deficiency Letter"). The Deficiency Letters advised Claimants that unless the indicated
21 deficiency was corrected within thirty (30) days, the claim would be denied. Examples of the
22 letters sent for failure to sign the Claim Form and filing a Claim Form that did not contain
23 purchase information are attached as Exhibits D and E, respectively.

24 29. For the Claimant that failed to sign the Claim Form, after consultation with Class
25 Counsel, the condition was waived and the claim was rendered eligible.

30. Between April 13, 2011 and November 1, 2011, Rust received purchase data from Class Counsel² and entered this information into the DRAM-Additional Settlements database. The purchase data identified, per the Defendants, the amounts of eligible DRAM purchased by all individuals or entities during the Class Period ("Defendant Data").

31. For the Claims that were deficient for a failure to provide purchase information, Rust researched the Defendant Data and if Defendant Data was available, that Defendant Data was used as the Claim Form amount.

32. Of the deficiency letters mailed for a failure to provide any purchase information, referred to above, 12 responded and provided purchase information or Defendant Data was located and used as the Claim Form Amount.

33. A total of 109 Claims are ineligible as a result of a failure to provide purchase information on their Claim Form.

34. The Claims rendered ineligible as outlined in ¶¶ 12 – 26 above had total purchases of approximately \$2.5 billion.

Audit Process

35. All remaining Claims were subject to review and/or audit by the Claims Administrator. After consulting with Co-Lead counsel, it was determined that all claims with purchases of \$100,000.00 and above would be audited. These Claims constituted approximately 99% of all potentially eligible dollars (approximately \$1.4 billion in purchases) submitted by Claimants that were not previously deemed ineligible as outlined in ¶¶ 12 – 26 above. In total, 63 Claims were included in the audit process.

36. For these 63 selected Claims, a Request for Additional Information letter was sent to these Claimants beginning February 18, 2011 requesting that they provide proof to support their Claim. An example of the Request for Additional Information letter is attached as Exhibit F.

² This information was provided by Defendants' counsel in the form of a paper list.

1 37. If a Claimant requested an extension of the deadline in which to supply
2 documentation, the extension was granted.

3 38. As of July 1, 2011, 36 Claimants had failed to respond to their Request for
4 Additional Information letter and a second letter, a Final Request for Additional Information
5 letter, was sent to these 36 Claimants requesting that they provide proof to support their Claim.
6 An example of the "Final Request for Additional Information" letter is attached as Exhibit G.

7 39. After processing all of the responses for the Request for Additional Information
8 and Final Request for Additional Information letters, 27 Claimants did not respond and 36
9 Claimants responded.

10 40. Of those that did not respond, Rust reviewed the Defendant Data and if Defendant
11 Data existed for a non-responding Claimant, their Claim was updated accordingly. Four of the
12 27 Claimants that did not respond to the request for proof had Defendant Data and their Claims
13 were updated accordingly.

14 41. The remaining 23 Claims that failed to respond were rendered ineligible.

15 42. Documentation supplied by Claimants in response to the Request for Additional
16 Information, was comprised of documentation in the form of invoices, cancelled checks,
17 purchase orders, spreadsheets, screenshots of computer images, packing slips, wire transfer
18 confirmations, and other such documentation.

19 43. Rust reviewed the documentation supplied by the Claimants to confirm:

- 20 • the amount of the purchase;
21 • the date of the purchase;
22 • the type of purchase (ensure it was DRAM as defined by the Notice);
23 • who it was purchased from; and
24 • that it was "purchased in the United States."

25 44. Beginning June 23, 2010, Rust has communicated via telephone, email, and
26 correspondence with Claimants.
27
28

1 45. Some purchases, totaling in excess of \$627 million, were deemed ineligible
2 because they included:

- 3 • foreign purchases;
- 4 • purchases outside of the Class Period;
- 5 • purchases made from a company other than a Defendant company;
- 6 • purchases that were not DRAM;
- 7 • purchases from Toshiba and Claimant had excluded themselves in original
8 settlement; or,
- 9 • insufficient proof was provided.

10 46. Insufficient proof included:

- 11 • Electronic data;
- 12 • Purchase orders;
- 13 • Affidavits;
- 14 • Screen shots of internal software; and,
- 15 • Internal spreadsheets listing purchases with no supporting documentation.

16 47. Throughout the entire process of reviewing documentation, Rust was in contact
17 with the Claimants via telephone, email, and correspondence to advise them if additional
18 documentation was needed, if the documentation they provided rendered the Claim ineligible, or
19 if certain purchases were deemed outside the definition of the Class as defined by the Court.

20 48. Several conference calls occurred between Class Counsel, the Claims
21 Administrator, and/or the Claimants to determine eligible and ineligible Claims, in whole or in
22 part.

23 **Final Claim Totals**

24 49. On March 29, 2012, "Final Claim Total Letters" were mailed to the 63 Claimants
25 that received a Request for Additional Information letter, regardless if they had responded to the
26 Request for Additional Information letter.
27
28

1 50. The Final Claim Total Letters advised the Claimants of the determined final
2 Claim value. Examples of the Final Claim Total Letters are attached as Exhibit H.

3 51. After the completion of audits, document review, communications (email, USPS
4 and telephone) with Claimants and processing of late Claims, there are 8,619 Claims that are
5 ineligible.

6 52. After the completion of audits, document reviews, communications (emails,
7 USPS and telephone) with Claimants and processing of late Claims, there were 664 Claimants
8 authorized for payment. The total purchases by all eligible Claimants was \$390,753,135,
9 approximately \$3.5 billion less than the original Claim Forms filed. Please see schedule of
10 Claimants and their percentage of the Net Settlement fund attached as Exhibit I. To protect the
11 privacy of these Claimants, their names have been redacted.

12 **Allocation of the Net Settlement Fund**

13 53. Rust prepared and provided to Class Counsel, a list of 664 Claimants for
14 distribution of the Net Settlement Fund on a *pro rata* basis among Class Members based on the
15 dollar amount each Class Member paid to Defendants for direct purchases of DRAM from the
16 Defendants during the period April 1, 1999 through June 30, 2002 and whose Claims are
17 determined by Rust to be eligible to receive a distribution from the Net Settlement Fund. The
18 total purchases by all eligible Claimants are \$390,753,135.

19 54. Included in the Authorized Claimants are 2 Claimants whose Claims were
20 postmarked later than December 10, 2010, (or which were otherwise received after December
21 10, 2010) but who would otherwise be eligible to receive a distribution from the Net Settlement
22 Fund ("Late Claims").

23 55. Upon approval of this Court, Rust intends to mail Authorized Claimants their *pro*
24 *rata* portion of the Net Settlement Fund.

25 **Claims Administration Fees**

26 56. Throughout the notice and claims administration process, Rust provided to Class
27 Counsel invoices for settlement administration fees and expenses. Invoices totaling \$125,319.70
28

1 have been submitted to Class Counsel for administrative fees and out-of-pocket expenses from
2 May 1, 2011 through December 31, 2013 and have not been paid as of today's date. A copy of
3 the most recent invoice is attached as Exhibit J.

4 57. Attached as Exhibit K is Rust's estimate of fees and expenses to be incurred
5 through completion of the claims administration process which total \$34,969. Estimated fees and
6 expenses include the preparation of court filing, setting up a distribution account, sending initial
7 and reissued payments to Claimants, and responding to Claimant inquiries.

8 **Records Retention and Destruction**

9 58. Rust requests that the Court enter an Order authorizing it to destroy the paper
10 copies of the Claim Forms one year after the Action is concluded, and to destroy electronic copies
11 of Claim records three years after the Action is concluded.

12
13 I declare under penalty of perjury that the foregoing is true and correct to the best of my
14 knowledge and that this declaration was executed on this 28th day of January, 2014.

15
16
17
18 

19
20 Robin Niemiec

EXHIBIT A

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416

XXXX XX, 2011

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«compute_0009»«compute_0010»
«compute_0011»
«compute_0012», «compute_0013» «compute_0014»

NOTICE OF INELIGIBILITY * * * Claim No. <<clm_no>>

Dear Claimant:

We have received and processed the Proof of Claim that you filed in the DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi Settlements.

The Class is defined as: “All individuals and entities who directly purchased DRAM (Dynamic Random Access Memory) in the United States during the period April 1, 1999 through June 20, 2002 from Defendants Mitsubishi Electric Corporation, Mitsubishi Electric and Electronics USA, Inc., Hitachi, Ltd., Toshiba America Electronic Components, Inc. and Toshiba Corporation.”

Pursuant to the Defendants’ records, you did not purchase DRAM during the Class Period. Therefore, your claim is ineligible. In order to be eligible to receive a distribution, you would have needed to purchase Dynamic Access Memory (DRAM) directly from the Defendant during the Class Period (April 1, 1999 through June 20, 2002). Therefore, if you purchased a computer that included DRAM, the purchase of the computer and/or the DRAM that came with your computer is not eligible. If you purchased DRAM from anyone other than Mitsubishi, Hitachi or Toshiba directly (for example, Best Buy), your purchase is not eligible.

IF YOU DISAGREE with this determination, you must advise us in writing by Xxxx xx, 2011. Your letter must also include adequate documentation supporting your claim amount. Adequate documentation consists of: invoices, cancelled checks and/or other documentation showing the placing, fulfillment and payment of an order. If your submission is late, it will not be considered.

If you have any questions, please call us toll-free at 1-866-483-9938.

Sincerely yours,

Class Administrator

EXHIBIT B

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416
1-866-483-9938

XXXX XX, 2011

«compute_0007»
«compute_0008»
«compute_0009»«compute_0010»
«compute_0011»
«compute_0012», «compute_0013» «compute_0014»

NOTICE OF INELIGIBILITY - Claim No. «clm_no»

Dear Claimant:

We have received and processed more than one Proof of Claim Forms that you filed, or that was filed on your behalf, in the DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi Settlement. We write to advise you that we consider Claim No. <<clm_no>>, submitted in the amount of \$<< clm_dtl.grand_total >>, as a duplicate of Claim No. <<orig_clm_no>> in the amount of \$ << orig_clm_dtl.grand_total >>.

Only one Proof of Claim form is necessary. The duplicative Proof of Claim form, which has been assigned the Claim Number listed above, is considered ineligible. In accordance with the Settlement Agreement approved by the Court, we have processed Proof of Claim No. <<orig_clm_no>> and any payment you may be entitled to will be based on this claim. You may receive additional letters if other deficient conditions are identified in this claim.

IF YOU AGREE with this determination, you do not need to do anything in response to this letter.

IF YOU DISAGREE WITH THIS DETERMINATION, you must advise us in writing by XXX. Your letter must also include adequate documentation supporting your position. Adequate documentation consists of invoices, cancelled checks and/or other documentation showing the placing, fulfillment and payment of an order. If your submission is late, it will be denied.

If you have any questions about this, please call our toll-free number 1-866-483-9938.

Sincerely yours,

Class Administrator

EXHIBIT C

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416

XXX, 2012

«compute_0007»
«compute_0008»
«compute_0009»«compute_0010»
«compute_0011»
«compute_0012», «compute_0013»«compute_0014»

NOTICE OF INELIGIBILITY * * * Claim No. <<clm_no>>

Dear Claimant:

We have received and processed the Proof of Claim and supporting documentation that you filed in the DRAM Antitrust Litigation – Toshiba, Hitachi, and Mitsubishi Settlements. We have also reviewed the documentation provided to us by Defendants Toshiba, Hitachi, and Mitsubishi.

Pursuant to the Defendants' records and documentation that you provided, you did not have any eligible purchases of DRAM made DIRECTLY from the Defendants during the Class Period (April 1, 1999 through June 30, 2002). Therefore, your claim has been determined ineligible.

If you have any questions, please call us toll-free at 1-866-483-9938.

Sincerely,

Class Administrator

EXHIBIT D

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416
1-866-483-9938

XXXX XX, 2011

RESPONSE DUE DATE: POSTMARKED BY XXXX XX, 2011

«compute_0007»
«compute_0008»
«compute_0009»«compute_0010»
«compute_0011»
«compute_0012», «compute_0013» «compute_0014»

REQUEST FOR INFORMATION - Claim No. Claim No: «clm_no»

Dear Claimant:

We have received and processed the Proof of Claim that you filed in the DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi Settlement. However, we noted a deficiency in the claim you submitted. Your Proof of Claim was missing a signature of the Class Member. You may receive additional letters if other deficient conditions are identified in this claim.

In order to ensure you receive the correct distribution from the Settlement Fund, please sign and date this letter where indicated below and return it to the address listed above by the Response Due Date. If you do not respond by the above Response date, your claim will be denied.

If you have any questions, please call us at 1-866-483-9938.

Sincerely yours,

Class Administrator

I (WE) DECLARE, UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, THAT THE INFORMATION PROVIDED IN THE PREVIOUSLY FILED PROOF OF CLAIM FORM IS TRUE AND CORRECT.

Claimant Signature

Date

EXHIBIT E

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416
1-866-483-9938

XXXX XX, 2011

RESPONSE DUE DATE: POSTMARKED BY XXXX XX, 2011

«compute_0007»
«compute_0008»
«compute_0009»«compute_0010»
«compute_0011»
«compute_0012», «compute_0013» «compute_0014»

REQUEST FOR ADDITIONAL INFORMATION * Claim No: «clm_no»**

Dear Claimant:

We have received the Proof of Claim that you filed in the DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi Settlement. The Proof of Claim that you filed contained no purchase information. Therefore, we are enclosing another Proof of Claim form for you to properly fill out. You should list all purchase(s) made during the Class Period (April 1, 1999 through June 30, 2002).

To ensure you receive the correct distribution, if any, from the Settlement Fund, you must return the completed Proof of Claim, along with a copy of this letter and adequate documentation of purchases by the Response Due Date to the address listed above. Adequate documentation of purchases includes: invoices, cancelled checks and/or other documentation showing the placing, fulfillment and payment of an order. If you do not respond by the above Response date, your claim will be denied. If you have any questions, please call us toll-free at 1-866-483-9938.

Sincerely yours,

Class Administrator

EXHIBIT F

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL33416

XXX, 2011

RESPONSE DUE DATE: POSTMARKED BY XXX, 2011

«compute_0007»
«compute_0008»
«compute_0009»«compute_0010»
«compute_0011»
«compute_0012», «compute_0013»«compute_0014»

REQUEST FOR ADDITIONAL INFORMATION * * * Claim No. <<clm_no>>

Dear Claimant:

We have received and processed the Proof of Claim that you filed in the DRAM Antitrust Litigation. The Proof of Claim that you filed has been chosen for an audit.

An audit is a request for adequate proof to support your Claim. To comply with this audit, you must supply adequate documentation of purchases provided on your Claim Form by the Response Due Date to the address listed above. Please return a copy of this letter with your proof. Adequate documentation consists of: invoices, cancelled checks and/or other documentation showing the placing, fulfillment and payment of an order. A spreadsheet or other documentation prepared by you is not adequate documentation. If you do not respond by the above Response Due Date, your Claim, in whole or in part, may be denied.

If you have any questions, please call Lara Kashdan, Project Manager, at our toll-free telephone number 1-800-930-0057 or email her at lkashdan@rustconsulting.com. You may receive additional letters if other deficient conditions are identified in this claim.

Sincerely yours,

Class Administrator

EXHIBIT G

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL33416

July 1, 2011

RESPONSE DUE DATE: POSTMARKED BY JULY 22, 2011

«compute_0007»
«compute_0008»
«compute_0009»«compute_0010»
«compute_0011»
«compute_0012», «compute_0013»«compute_0014»

FINAL REQUEST FOR ADDITIONAL INFORMATION * * * Claim No. <<clm_no>>

Dear Claimant:

On February 18, 2011, a “Request for Additional Information” letter was mailed to you requesting that you provide adequate documentation to support your claim in the DRAM Antitrust Litigation. The Response Due Date has now passed and we have not received a response. In order for your claim to be eligible for any distribution, you must submit the requested documentation along with a copy of this letter by the Response Due Date above.

Adequate documentation consists of: invoices or purchase orders accompanied by the corresponding proof of payment to show the placing, fulfillment and payment of DRAM purchases in the United States, during the period of April 1, 1999 through June 30, 2002, and directly from Defendants Mitsubishi Electric Corporation, Mitsubishi Electric and Electronics USA, Inc., Hitachi, Ltd., or Toshiba America Electronic Components, Inc. and Toshiba Corporation. A spreadsheet or other documentation prepared by you is not adequate documentation.

Failure to provide the requested documentation by the Response Due Date listed above will result in the disallowance of your claim.

If you have any questions, please call our toll-free telephone number 1-866-483-9938.

Sincerely,

Class Administrator

EXHIBIT H

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416

XX, 2012

XXX

NOTICE OF FINAL CLAIM DETERMINATION* * * Claim No. 00xxxx

Dear Sir or Madame:

We received and processed your claim and any documentation in support of your claim and the defendants' records in the DRAM Antitrust Litigation – Toshiba, Hitachi, and Mitsubishi Settlements. On February 18, 2011, we requested proof of your purchases to substantiate your claim. We processed a response from you on April 6, 2011.

This letter is to confirm that your final Claim amount is \$XX.

This amount is the basis for calculating any settlement benefits in which you may be entitled.

If you have any questions, please call our toll-free telephone number 1-866-483-9938.

Sincerely,

Class Administrator

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416

XX, 2012

X

NOTICE OF FINAL CLAIM DETERMINATION* * * Claim No. 00xxxx

Dear XX:

We received and processed your claim and any documentation in support of your claim and the defendants' records in the DRAM Antitrust Litigation – Toshiba, Hitachi, and Mitsubishi Settlements. On February 18, 2011, we requested proof of your purchases to substantiate your claim. On April 6, 2011, we processed documentation from you; however, we notified you that the documentation was insufficient. On October 28, 2011, we sent an email to you notifying you of the insufficient documentation. You failed to provide us with any additional documentation.

Your claim was reduced based on a review of the documentation. This letter is to confirm that your final Claim amount is \$XXXX.

This amount is the basis for calculating any settlement benefits in which you may be entitled.

If you have any questions, please call our toll-free telephone number 1-866-483-9938.

Sincerely,

Class Administrator

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416

XX, 2012

XXX

NOTICE OF FINAL CLAIM DETERMINATION* * * Claim No. 00xxxx

Dear Sir or Madame:

We received and processed your claim and any documentation in support of your claim and the defendants' records in the DRAM Antitrust Litigation – Toshiba, Hitachi, and Mitsubishi Settlements. On February 18, 2011, we requested proof of your purchases to substantiate your claim. We did not receive a response from you and sent another request for proof of purchase letter to you on July 1, 2011. You failed to provide us with any documentation.

Your claim was reduced based on a review of the documentation. This letter is to confirm that your final Claim amount is \$0.

This amount is the basis for calculating any settlement benefits in which you may be entitled.

If you have any questions, please call our toll-free telephone number 1-866-483-9938.

Sincerely,

Class Administrator

DRAM Antitrust Litigation – Toshiba, Hitachi, Mitsubishi
c/o Rust Consulting, Inc.
P.O. Box 24657
West Palm Beach, FL 33416

XX, 2012

XX
XX
XX

NOTICE OF FINAL CLAIM DETERMINATION* * * Claim No. 000XXX

Dear XX:

We received and processed your claim and any documentation in support of your claim. We also reviewed the defendants' records in the DRAM Antitrust Litigation – Toshiba, Hitachi, and Mitsubishi Settlements. On February 18, 2011, we requested proof of your purchases to substantiate your claim. We did not receive a response from you and sent another request for proof of purchase letter to you on July 1, 2011. You failed to provide us with any documentation.

Your claim was reduced based on a review of the documentation. This letter is to confirm that your final Claim amount is \$0.

This amount is the basis for calculating any settlement benefits to which you may be entitled.

If you have any questions, please call our toll-free telephone number 1-866-483-9938.

Sincerely,

Class Administrator

EXHIBIT I

Authorized Claimants

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PROJECT: DRAM - Additional Settlements - Database: dras

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Report Criteria: None

Report ID :DST23W000

DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	2561	102,617,238.00	0.262613985170
	2831	85,572,812.00	0.218994562897
	2763	76,849,879.00	0.196671177059
	306283	40,535,885.00	0.103737836934
	302720	32,593,352.00	0.083411619973
	306015	11,119,016.00	0.028455346878
	2701	7,786,559.00	0.019927054456
	306342	7,436,532.00	0.019031279173
	2764	4,411,555.00	0.011289877431
	2719	4,080,000.00	0.010441374962
	2744	3,500,000.00	0.008957061854
	306138	3,065,301.00	0.007844597331
	2702	1,891,500.00	0.004840652142
	2803	1,381,312.00	0.003534999150
	2768	985,881.00	0.002523027742
	306340	818,249.00	0.002094030544
	305924	792,500.00	0.002028134720
	306115	650,450.00	0.001664605967
	2631	500,000.00	0.001279580265
	2819	394,625.00	0.001009908724
	2557	345,356.00	0.000883821444
	2857	343,500.00	0.000879071642
	305198	105,000.00	0.000268711856
	2822	98,629.00	0.000252407444
	1821	91,908.00	0.000235207326
	306043	83,500.00	0.000213689904
	1423	76,508.00	0.000195796254
	485	72,226.00	0.000184837928
	342	72,165.00	0.000184681820
	302698	70,135.00	0.000179486724
	2608	60,000.00	0.000153549632
	1041	58,975.00	0.000150926492
	306252	57,531.00	0.000147231064
	1413	50,000.00	0.000127958026
	2832	50,000.00	0.000127958026
	668	47,000.00	0.000120280545
	137	41,850.00	0.000107100868
	300313	40,944.00	0.000104782269
	332	40,000.00	0.000102366421
	302958	39,835.00	0.000101944160
	300678	38,267.00	0.000097931396
	306246	35,645.00	0.000091221277
	1881	34,046.00	0.000087129179
	2531	32,600.00	0.000083428633
	1100	32,446.00	0.000083034523
	306071	31,600.00	0.000080869473
	306337	30,000.00	0.000076774816
	302203	30,000.00	0.000076774816
	1239	29,378.00	0.000075183018
	306070	27,800.00	0.000071144663
	44	25,686.00	0.000065734597
	554	25,000.00	0.000063979013
	301834	24,665.00	0.000063121694
	300328	23,000.00	0.000058860692
	2416	22,000.00	0.000056301532
	1546	21,461.00	0.000054922144
	1198	20,257.00	0.000051840915
	2669	20,009.00	0.000051206243
	302227	19,864.00	0.000050835165

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Report Criteria: None

Report ID :DST23W000

DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	300938	19,481.00	0.000049855006
	14	19,450.00	0.000049775672
	304765	17,861.00	0.000045709166
	302347	17,170.00	0.000043940786
	2160	16,848.00	0.000043116737
	306313	16,845.00	0.000043109059
	1209	16,570.00	0.000042405290
	2747	16,557.00	0.000042372021
	1240	16,348.00	0.000041837156
	1589	15,400.00	0.000039411072
	2511	15,206.00	0.000038914595
	301789	15,185.00	0.000038860853
	305640	15,071.00	0.000038569108
	301008	15,000.00	0.000038387408
	305465	14,752.00	0.000037752736
	304349	14,630.00	0.000037440519
	304726	14,388.00	0.000036821202
	1159	14,364.00	0.000036759782
	302694	14,259.00	0.000036491070
	1677	14,000.00	0.000035828247
	301837	13,321.00	0.000034090577
	2711	12,954.00	0.000033151366
	306280	12,740.00	0.000032603705
	305532	12,600.00	0.000032245423
	2731	12,357.00	0.000031623547
	2247	12,075.00	0.000030901863
	302867	11,976.00	0.000030648507
	787	11,720.00	0.000029993361
	301095	11,500.00	0.000029430346
	1475	11,386.00	0.000029138602
	769	11,300.00	0.000028918514
	303806	11,109.00	0.000028429714
	305885	11,000.00	0.000028150766
	2442	11,000.00	0.000028150766
	302245	10,000.00	0.000025591605
	304585	10,000.00	0.000025591605
	301089	9,800.00	0.000025079773
	304529	9,780.00	0.000025028590
	596	9,428.00	0.000024127765
	303140	9,300.00	0.000023800193
	303079	9,110.00	0.000023313952
	300787	9,000.00	0.000023032445
	300528	8,500.00	0.000021752865
	302395	8,500.00	0.000021752865
	1271	8,382.00	0.000021450884
	301407	8,300.00	0.000021241032
	303045	8,000.00	0.000020473284
	305049	7,879.00	0.000020163626
	302594	7,818.00	0.000020007517
	304385	7,747.00	0.000019825817
	300884	7,515.00	0.000019232091
	300303	7,500.00	0.000019193704
	300865	7,500.00	0.000019193704
	303207	7,423.00	0.000018996649
	305857	7,350.00	0.000018809830
	767	7,309.00	0.000018704904
	2543	7,304.00	0.000018692109
	942	7,300.00	0.000018681872
	556	7,150.00	0.000018297998

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Report Criteria: None

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DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	303002	7,000.00	0.000017914124
	1900	6,834.00	0.000017489303
	2530	6,750.00	0.000017274334
	306227	6,744.00	0.000017258979
	305023	6,689.00	0.000017118225
	303844	6,600.00	0.000016890459
	949	6,387.00	0.000016345358
	580	6,190.00	0.000015841204
	304131	6,052.00	0.000015488040
	2057	6,030.00	0.000015431738
	2116	6,000.00	0.000015354963
	1142	6,000.00	0.000015354963
	304536	5,967.00	0.000015270511
	328	5,943.00	0.000015209091
	2313	5,926.00	0.000015165585
	301085	5,700.00	0.000014587215
	361	5,602.00	0.000014336417
	302108	5,500.00	0.000014075383
	2424	5,450.00	0.000013947425
	1941	5,400.00	0.000013819467
	930	5,393.00	0.000013801553
	301439	5,294.00	0.000013548196
	1323	5,277.00	0.000013504690
	301886	5,100.00	0.000013051719
	300706	5,000.00	0.000012795803
	305647	5,000.00	0.000012795803
	301693	5,000.00	0.000012795803
	305386	4,990.00	0.000012770211
	300983	4,970.00	0.000012719028
	305014	4,963.00	0.000012701114
	1439	4,875.00	0.000012475908
	305699	4,804.00	0.000012294207
	302728	4,800.00	0.000012283971
	304107	4,800.00	0.000012283971
	2321	4,800.00	0.000012283971
	305796	4,770.00	0.000012207196
	300293	4,707.00	0.000012045969
	310	4,636.00	0.000011864268
	301250	4,530.00	0.000011592997
	303293	4,500.00	0.000011516222
	305741	4,419.00	0.000011308930
	69	4,400.00	0.000011260306
	315	4,400.00	0.000011260306
	302248	4,382.00	0.000011214241
	300379	4,262.00	0.000010907142
	303342	4,214.00	0.000010784302
	302735	4,209.00	0.000010771507
	306177	4,122.00	0.000010548860
	303884	4,000.00	0.000010236642
	1314	3,920.00	0.000010031909
	1676	3,725.00	0.000009532873
	304953	3,700.00	0.000009468894
	302548	3,698.00	0.000009463776
	2536	3,625.00	0.000009276957
	750	3,600.00	0.000009212978
	1275	3,571.00	0.000009138762
	300290	3,500.00	0.000008957062
	800	3,500.00	0.000008957062
	303974	3,500.00	0.000008957062

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DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	1886	3,500.00	0.000008957062
	306243	3,434.00	0.000008788157
	544	3,413.00	0.000008734415
	305146	3,388.00	0.000008670436
	302585	3,284.00	0.000008404283
	305566	3,250.00	0.000008317272
	305615	3,200.00	0.000008189314
	479	3,128.00	0.000008005054
	304841	3,097.00	0.000007925720
	302353	3,000.00	0.000007677482
	2143	3,000.00	0.000007677482
	300287	3,000.00	0.000007677482
	304748	3,000.00	0.000007677482
	302131	3,000.00	0.000007677482
	302001	3,000.00	0.000007677482
	1074	3,000.00	0.000007677482
	300603	3,000.00	0.000007677482
	306083	3,000.00	0.000007677482
	305411	3,000.00	0.000007677482
	797	3,000.00	0.000007677482
	303484	2,997.00	0.000007669804
	1248	2,950.00	0.000007549524
	435	2,849.00	0.000007291048
	306080	2,831.00	0.000007244983
	226	2,800.00	0.000007165649
	304513	2,649.00	0.000006779216
	300432	2,600.00	0.000006653817
	302253	2,600.00	0.000006653817
	1848	2,550.00	0.000006525859
	1453	2,550.00	0.000006525859
	1957	2,500.00	0.000006397901
	2420	2,500.00	0.000006397901
	305693	2,500.00	0.000006397901
	1952	2,500.00	0.000006397901
	303452	2,500.00	0.000006397901
	300940	2,475.00	0.000006333922
	1592	2,400.00	0.000006141985
	305664	2,400.00	0.000006141985
	305116	2,395.00	0.000006129189
	305381	2,350.00	0.000006014027
	1942	2,334.00	0.000005973081
	2269	2,300.00	0.000005886069
	712	2,280.00	0.000005834886
	304209	2,244.00	0.000005742756
	300655	2,230.00	0.000005706928
	301227	2,200.00	0.000005630153
	1786	2,200.00	0.000005630153
	1946	2,200.00	0.000005630153
	303691	2,200.00	0.000005630153
	306362	2,200.00	0.000005630153
	1384	2,174.00	0.000005563615
	304771	2,168.00	0.000005548260
	305516	2,150.00	0.000005502195
	739	2,100.00	0.000005374237
	2612	2,100.00	0.000005374237
	2230	2,095.00	0.000005361441
	875	2,095.00	0.000005361441
	305509	2,074.00	0.000005307699
	565	2,050.00	0.000005246279

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Report Criteria: None

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DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	724	2,049.00	0.000005243720
	304413	2,000.00	0.000005118321
	302212	2,000.00	0.000005118321
	2240	2,000.00	0.000005118321
	302815	2,000.00	0.000005118321
	2603	1,960.00	0.000005015955
	306245	1,950.00	0.000004990363
	2428	1,917.00	0.000004905911
	300134	1,900.00	0.000004862405
	442	1,890.00	0.000004836813
	2016	1,875.00	0.000004798426
	302326	1,863.00	0.000004767716
	784	1,825.00	0.000004670468
	301309	1,807.00	0.000004624403
	305982	1,800.00	0.000004606489
	2348	1,800.00	0.000004606489
	301483	1,800.00	0.000004606489
	304462	1,800.00	0.000004606489
	2562	1,793.00	0.000004588575
	304579	1,750.00	0.000004478531
	301164	1,722.00	0.000004406874
	300718	1,700.00	0.000004350573
	305367	1,700.00	0.000004350573
	2412	1,699.00	0.000004348014
	300729	1,689.00	0.000004322422
	849	1,624.00	0.000004156077
	2387	1,620.00	0.000004145840
	1251	1,571.00	0.000004020441
	305529	1,562.00	0.000003997409
	305842	1,529.00	0.000003912956
	305127	1,520.00	0.000003889924
	2053	1,512.00	0.000003869451
	302486	1,500.00	0.000003838741
	300090	1,500.00	0.000003838741
	1597	1,500.00	0.000003838741
	2739	1,432.00	0.000003664718
	302435	1,432.00	0.000003664718
	1496	1,430.00	0.000003659600
	301339	1,427.00	0.000003651922
	302174	1,420.00	0.000003634008
	300746	1,415.00	0.000003621212
	302145	1,400.00	0.000003582825
	62	1,394.00	0.000003567470
	1723	1,388.00	0.000003552115
	303328	1,386.00	0.000003546996
	2574	1,385.00	0.000003544437
	303790	1,377.00	0.000003523964
	2642	1,354.00	0.000003465103
	1247	1,352.00	0.000003459985
	303788	1,332.00	0.000003408802
	302258	1,312.00	0.000003357619
	772	1,300.00	0.000003326909
	301166	1,278.00	0.000003270607
	1747	1,260.00	0.000003224542
	308	1,250.00	0.000003198951
	300169	1,250.00	0.000003198951
	1908	1,243.00	0.000003181037
	305787	1,239.00	0.000003170800
	302234	1,217.00	0.000003114498

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DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	1622	1,200.00	0.000003070993
	1971	1,200.00	0.000003070993
	306118	1,200.00	0.000003070993
	300596	1,200.00	0.000003070993
	303981	1,200.00	0.000003070993
	301467	1,200.00	0.000003070993
	305607	1,194.00	0.000003055638
	2383	1,140.00	0.000002917443
	301915	1,126.00	0.000002881615
	1374	1,125.00	0.000002879056
	2429	1,100.00	0.000002815077
	300174	1,100.00	0.000002815077
	1408	1,099.00	0.000002812517
	305474	1,092.00	0.000002794603
	302018	1,090.00	0.000002789485
	1197	1,085.00	0.000002776689
	786	1,079.00	0.000002761334
	474	1,072.00	0.000002743420
	304787	1,050.00	0.000002687119
	300649	1,050.00	0.000002687119
	305898	1,047.00	0.000002679441
	305348	1,037.00	0.000002653849
	301956	1,036.00	0.000002651290
	300840	1,034.00	0.000002646172
	302748	1,030.00	0.000002635935
	915	1,004.00	0.000002569397
	2089	1,000.00	0.000002559161
	300163	1,000.00	0.000002559161
	305684	1,000.00	0.000002559161
	302404	1,000.00	0.000002559161
	304028	1,000.00	0.000002559161
	303223	1,000.00	0.000002559161
	1843	1,000.00	0.000002559161
	2740	999.00	0.000002556601
	346	983.00	0.000002515655
	305766	973.00	0.000002490063
	302527	970.00	0.000002482386
	300503	954.00	0.000002441439
	300249	950.00	0.000002431203
	302316	950.00	0.000002431203
	303706	938.00	0.000002400493
	2246	929.00	0.000002377460
	1962	917.00	0.000002346750
	300060	900.00	0.000002303244
	1079	900.00	0.000002303244
	799	900.00	0.000002303244
	301155	900.00	0.000002303244
	300003	900.00	0.000002303244
	304992	892.00	0.000002282771
	300305	875.00	0.000002239265
	410	875.00	0.000002239265
	306387	875.00	0.000002239265
	893	869.00	0.000002223911
	301110	862.00	0.000002205996
	1112	857.00	0.000002193201
	302387	851.00	0.000002177846
	2046	846.00	0.000002165050
	302526	830.00	0.000002124103
	306091	829.00	0.000002121544

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Report Criteria: None

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DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	305797	810.00	0.000002072920
	303271	800.00	0.000002047328
	301682	800.00	0.000002047328
	304295	800.00	0.000002047328
	300515	800.00	0.000002047328
	1925	800.00	0.000002047328
	304228	800.00	0.000002047328
	300893	797.00	0.000002039651
	2443	781.00	0.000001998704
	302137	775.00	0.000001983349
	302487	775.00	0.000001983349
	302430	768.00	0.000001965435
	683	762.00	0.000001950080
	300057	755.00	0.000001932166
	304062	755.00	0.000001932166
	300643	754.00	0.000001929607
	301499	753.00	0.000001927048
	303571	753.00	0.000001927048
	302235	750.00	0.000001919370
	1063	750.00	0.000001919370
	300146	750.00	0.000001919370
	2837	740.00	0.000001893779
	306132	730.00	0.000001868187
	306111	726.00	0.000001857951
	300085	720.00	0.000001842596
	303388	720.00	0.000001842596
	306127	713.00	0.000001824681
	302249	700.00	0.000001791412
	302069	700.00	0.000001791412
	302668	700.00	0.000001791412
	300296	700.00	0.000001791412
	300052	700.00	0.000001791412
	301540	700.00	0.000001791412
	2259	678.00	0.000001735111
	567	668.00	0.000001709519
	302827	650.00	0.000001663454
	300878	638.00	0.000001632744
	305119	637.00	0.000001630185
	304	635.00	0.000001625067
	2384	627.00	0.000001604594
	304686	627.00	0.000001604594
	108	616.00	0.000001576443
	305503	608.00	0.000001555970
	243	600.00	0.000001535496
	1873	600.00	0.000001535496
	654	600.00	0.000001535496
	302852	600.00	0.000001535496
	305086	600.00	0.000001535496
	1380	600.00	0.000001535496
	305530	599.00	0.000001532937
	300117	596.00	0.000001525260
	302691	575.00	0.000001471517
	302335	573.00	0.000001466399
	302240	570.00	0.000001458722
	1069	568.00	0.000001453603
	1266	555.00	0.000001420334
	302490	554.00	0.000001417775
	300018	554.00	0.000001417775
	300666	540.00	0.000001381947

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Authorized Claimants

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PROJECT: DRAM - Additional Settlements - Database: dras

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Report Criteria: None

Report ID :DST23W000

DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	304374	521.00	0.000001333323
	305022	519.00	0.000001328204
	300703	515.00	0.000001317968
	302280	510.00	0.000001305172
	305508	503.00	0.000001287258
	300367	500.00	0.000001279580
	302385	500.00	0.000001279580
	302264	500.00	0.000001279580
	300098	500.00	0.000001279580
	302370	500.00	0.000001279580
	300535	500.00	0.000001279580
	305271	500.00	0.000001279580
	303826	500.00	0.000001279580
	231	498.00	0.000001274462
	536	495.00	0.000001266784
	31	495.00	0.000001266784
	388	486.00	0.000001243752
	1006	485.00	0.000001241193
	305193	480.00	0.000001228397
	303220	475.00	0.000001215601
	252	475.00	0.000001215601
	303647	466.00	0.000001192569
	2596	462.00	0.000001182332
	306312	460.00	0.000001177214
	224	456.00	0.000001166977
	300331	450.00	0.000001151622
	2362	450.00	0.000001151622
	482	450.00	0.000001151622
	1047	450.00	0.000001151622
	301872	450.00	0.000001151622
	300537	450.00	0.000001151622
	22	450.00	0.000001151622
	301123	449.00	0.000001149063
	300827	444.00	0.000001136267
	305817	440.00	0.000001126031
	2524	436.00	0.000001115794
	2059	436.00	0.000001115794
	302663	425.00	0.000001087643
	301991	425.00	0.000001087643
	306044	420.00	0.000001074847
	2470	414.00	0.000001059492
	220	412.00	0.000001054374
	514	409.00	0.000001046697
	302731	400.00	0.000001023664
	300553	400.00	0.000001023664
	303198	400.00	0.000001023664
	1854	400.00	0.000001023664
	302012	400.00	0.000001023664
	300234	400.00	0.000001023664
	303408	400.00	0.000001023664
	301554	400.00	0.000001023664
	301225	400.00	0.000001023664
	2248	397.00	0.000001015987
	301016	392.00	0.000001003191
	811	385.00	0.000000985277
	2377	382.00	0.000000977599
	303695	376.00	0.000000962244
	300141	370.00	0.000000946889
	2182	360.00	0.000000921298

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Report Criteria: None

Report ID :DST23W000

DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	481	358.00	0.000000916179
	302341	358.00	0.000000916179
	304969	353.00	0.000000903384
	367	352.00	0.000000900825
	1461	352.00	0.000000900825
	305768	350.00	0.000000895706
	306261	350.00	0.000000895706
	303937	347.00	0.000000888029
	304493	346.00	0.000000885470
	306059	345.00	0.000000882910
	300044	341.00	0.000000872674
	303282	337.00	0.000000862437
	302979	327.00	0.000000836845
	1081	325.00	0.000000831727
	303609	323.00	0.000000826609
	594	318.00	0.000000813813
	304924	315.00	0.000000806136
	947	314.00	0.000000803576
	300598	312.00	0.000000798458
	302813	311.00	0.000000795899
	1254	311.00	0.000000795899
	300046	309.00	0.000000790781
	730	308.00	0.000000788221
	1282	306.00	0.000000783103
	302461	303.00	0.000000775426
	300469	303.00	0.000000775426
	300773	301.00	0.000000770307
	467	300.00	0.000000767748
	302740	300.00	0.000000767748
	2106	300.00	0.000000767748
	302011	300.00	0.000000767748
	1064	300.00	0.000000767748
	305001	300.00	0.000000767748
	306291	300.00	0.000000767748
	2120	300.00	0.000000767748
	305784	300.00	0.000000767748
	300028	300.00	0.000000767748
	300547	300.00	0.000000767748
	302945	298.00	0.000000762630
	1895	288.00	0.000000737038
	340	281.00	0.000000719124
	303130	279.00	0.000000714006
	305467	279.00	0.000000714006
	776	277.00	0.000000708887
	531	273.00	0.000000698651
	383	265.00	0.000000678178
	304888	258.00	0.000000660263
	305486	256.00	0.000000655145
	301140	255.00	0.000000652586
	302028	251.00	0.000000642349
	303946	250.00	0.000000639790
	304819	250.00	0.000000639790
	305824	250.00	0.000000639790
	1604	250.00	0.000000639790
	300855	250.00	0.000000639790
	305087	250.00	0.000000639790
	1666	250.00	0.000000639790
	304366	250.00	0.000000639790
	303747	250.00	0.000000639790

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Report Criteria: None

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DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	303035	249.00	0.000000637231
	302725	249.00	0.000000637231
	2580	245.00	0.000000626994
	300988	244.00	0.000000624435
	305105	240.00	0.000000614199
	1339	238.00	0.000000609080
	303477	237.00	0.000000606521
	303802	237.00	0.000000606521
	1059	234.00	0.000000598844
	303763	234.00	0.000000598844
	303305	230.00	0.000000588607
	305539	225.00	0.000000575811
	304071	220.00	0.000000563015
	304431	220.00	0.000000563015
	303770	218.00	0.000000557897
	77	217.00	0.000000555338
	302472	212.00	0.000000542542
	302343	210.00	0.000000537424
	300844	210.00	0.000000537424
	1309	206.00	0.000000527187
	303584	204.00	0.000000522069
	302184	202.00	0.000000516950
	305304	200.00	0.000000511832
	1269	200.00	0.000000511832
	305273	200.00	0.000000511832
	2599	200.00	0.000000511832
	300054	200.00	0.000000511832
	303331	200.00	0.000000511832
	305197	200.00	0.000000511832
	191	200.00	0.000000511832
	300021	200.00	0.000000511832
	305618	200.00	0.000000511832
	2334	200.00	0.000000511832
	302944	198.00	0.000000506714
	302782	198.00	0.000000506714
	303543	190.00	0.000000486241
	497	181.00	0.000000463208
	2146	180.00	0.000000460649
	306069	169.00	0.000000432498
	303386	169.00	0.000000432498
	303118	166.00	0.000000424821
	302037	165.00	0.000000422261
	301688	162.00	0.000000414584
	1905	162.00	0.000000414584
	166	160.00	0.000000409466
	304738	160.00	0.000000409466
	1600	155.00	0.000000396670
	305553	152.00	0.000000388992
	305303	150.00	0.000000383874
	303939	150.00	0.000000383874
	306094	150.00	0.000000383874
	302438	150.00	0.000000383874
	302790	150.00	0.000000383874
	306133	149.00	0.000000381315
	302378	149.00	0.000000381315
	2121	144.00	0.000000368519
	636	144.00	0.000000368519
	592	142.00	0.000000363401
	305349	140.00	0.000000358282

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Report Criteria: None

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DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	306354	140.00	0.000000358282
	306320	139.00	0.000000355723
	304530	135.00	0.000000345487
	304215	134.00	0.000000342928
	1840	132.00	0.000000337809
	303522	130.00	0.000000332691
	1146	127.00	0.000000325013
	305201	126.00	0.000000322454
	302831	125.00	0.000000319895
	300083	120.00	0.000000307099
	302356	120.00	0.000000307099
	304899	120.00	0.000000307099
	886	119.00	0.000000304540
	302509	115.00	0.000000294303
	302230	112.00	0.000000286626
	869	110.00	0.000000281508
	301075	110.00	0.000000281508
	304989	100.00	0.000000255916
	306065	100.00	0.000000255916
	1479	100.00	0.000000255916
	303289	100.00	0.000000255916
	940	100.00	0.000000255916
	1121	100.00	0.000000255916
	300758	100.00	0.000000255916
	143	100.00	0.000000255916
	1849	100.00	0.000000255916
	300364	100.00	0.000000255916
	300868	100.00	0.000000255916
	302138	100.00	0.000000255916
	304982	100.00	0.000000255916
	304201	99.00	0.000000253357
	2712	98.00	0.000000250798
	302328	96.00	0.000000245679
	302266	95.00	0.000000243120
	303972	93.00	0.000000238002
	713	90.00	0.000000230324
	304794	89.00	0.000000227765
	302595	89.00	0.000000227765
	1436	89.00	0.000000227765
	304887	88.00	0.000000225206
	1009	87.00	0.000000222647
	305277	85.00	0.000000217529
	305877	84.00	0.000000214969
	304920	84.00	0.000000214969
	250	84.00	0.000000214969
	1190	82.00	0.000000209851
	304795	81.00	0.000000207292
	128	80.00	0.000000204733
	304591	80.00	0.000000204733
	306066	74.00	0.000000189378
	300810	70.00	0.000000179141
	301475	70.00	0.000000179141
	305070	70.00	0.000000179141
	303403	64.00	0.000000163786
	300030	64.00	0.000000163786
	281	63.00	0.000000161227
	2389	60.00	0.000000153550
	300828	59.00	0.000000150990
	2338	58.00	0.000000148431

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PROJECT: DRAM - Additional Settlements - Database: dras

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Report Criteria: None

Report ID :DST23W000

DISTRIBUTION NO: 1	CLM NO	RECOGNIZED LOSS	FRACTION OF FUND
	302014	55.00	0.000000140754
	1635	55.00	0.000000140754
	824	50.00	0.000000127958
	1910	50.00	0.000000127958
	301487	50.00	0.000000127958
	303846	50.00	0.000000127958
	313	49.00	0.000000125399
	1024	47.00	0.000000120281
	303561	46.00	0.000000117721
	2063	43.00	0.000000110044
	304821	40.00	0.000000102366
	301723	36.00	0.000000092130
	390	35.00	0.000000089571
	301096	25.00	0.000000063979
	2084	18.00	0.000000046065
<hr/>			
TOTAL CLAIMS:	664	390,753,135.00	1.000000000000

EXHIBIT J



Invoice

625 MARQUETTE AVENUE, SUITE 880
 MINNEAPOLIS, MN 55402
 P 612.359.2000 | F 612.359.2050
 WWW.RUSTCONSULTING.COM
 FEDERAL ID #: 41-1813634

DATE: 01/10/14
 INVOICE #: 138922
 MATTER #: 8236

TO: Rick Saveri, Esq.
 Saveri & Saveri, Inc.
 706 Sansome Street
 Suite 1700
 San Francisco, CA 94111
Rick@saveri.com

PROJECT
<i>DRAM Additional Settlements</i>
<i>December 2013 Claims Administration Services</i>

Project Management	\$ 55.80
Expenses: Other Charges and Out-of-Pocket Costs	<u>402.64</u>
Total Invoice	\$ 458.44
Outstanding Invoice(s)	<u>\$ 124,861.26</u>
Total Due	<u><u>\$ 125,319.70</u></u>

PAYMENT TERMS: NET DUE UPON RECEIPT

WIRE INFORMATION

ACCOUNT #: 8093434387
 ABA/ROUTING # WIRE or ACH: 111014325
 BANK: BANK OF TEXAS, DALLAS, TX 75225
 BANK CONTACT: MAYRA LANDEROS 214.987.8817
 REFERENCE: INVOICE NUMBER

RUST

PAYMENT MAILING ADDRESS:

P O BOX 142589
 DRAWER #9051
 Irving, TX 75014-2589



DATE: 01/10/14
 INVOICE #: 138922
 MATTER #: 8236

STATEMENT OF ACCOUNT

Current Invoice Period: December 2013 Claims Administration Services

Total Current Invoice \$ 458.44

OUTSTANDING INVOICES:

Date	Invoice #	Amount	Payments	Balance
06/30/11	108539	3,708.80		3,708.80
07/28/11	108578	8,959.89		8,959.89
08/29/11	108606	2,099.44		2,099.44
09/23/11	108644	1,272.57		1,272.57
10/31/11	108698	5,593.97		5,593.97
11/30/11	108728	3,184.65		3,184.65
12/30/11	108793	5,461.50		5,461.50
01/31/12	108823	9,119.16		9,119.16
02/29/12	128041	8,462.59		8,462.59
03/26/12	128084	17,446.32		17,446.32
04/30/12	128166	21,865.57		21,865.57
05/31/12	128233	11,413.30		11,413.30
06/29/12	128288	3,030.95		3,030.95
07/25/12	128340	1,997.17		1,997.17
08/28/12	128413	3,707.21		3,707.21
09/27/12	128467	996.80		996.80
10/16/12	128495	818.01		818.01
11/30/12	128607	773.45		773.45
12/21/12	128678	1,427.66		1,427.66
01/16/13	128728	781.17		781.17
02/14/13	138008	1,109.57		1,109.57
03/18/13	138104	762.29		762.29
04/26/13	138192	2,206.08		2,206.08
05/22/13	138279	3,961.48		3,961.48
06/24/13	138349	810.14		810.14
07/30/13	138452	422.10		422.10
08/14/13	138491	1,072.90		1,072.90
09/24/13	138635	1,023.05		1,023.05
10/25/13	138747	514.47		514.47
11/13/13	138771	461.96		461.96
12/20/13	138872	397.04		397.04

PREVIOUS BALANCE DUE \$ 124,861.26

Total Amount Due \$ 125,319.70

WIRE INFORMATION

ACCOUNT #: 8093434387
 ABA/ROUTING # WIRE or ACH: 111014325
 BANK: BANK OF TEXAS, DALLAS, TX 75225
 BANK CONTACT: MAYRA LANDEROS 214.987.8817
 REFERENCE: INVOICE NUMBER

RUST

PAYMENT MAILING ADDRESS:
 P O BOX 142589
 DRAWER #9051
 Irving, TX 75014-2589

PAYMENT TERMS: NET DUE UPON RECEIPT

Inv# 138922
 Date Jan 10, 2014
 Client Number 8236

Re: DRAM - Additional Settlements [DRAS] - Project Management 823606

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEs
Sylvia Nettles	SN	\$3.00	0.60	55.80
Total Fees:				55.80
12/13/13	SN	Financial/Administrative	0.30	27.90
12/20/13	SN	Financial/Administrative	0.30	27.90
Total Services				55.80
Total Expenses				.00
Total This Matter				55.80

Inv# 138922
 Date Jan 10, 2014
 Client Number 8236

Re: DRAM - Additional Settlements [DRAS] - Expenses 823690

For Professional Services Rendered:

Expense Detail:

Reference	Date	Description	Amount
-----	----	-----	-----
		Call Center/Telecommunications	
	12/31/13	IVR 55.92 Minutes	10.62
	12/31/13	Long Distance 38.4 Minutes	4.61
	12/31/13	IVR System Charge	250.00
		Subtotal	265.23
		Shredding/Storage	
	12/31/13	Data Storage December 2013	135.01
		Subtotal	135.01
		Photocopies/Faxing/Printing	
	12/31/13	Photocopies/Faxing/Printing	2.40
		Subtotal	2.40
		Total Expenses	402.64

		Total This Matter	402.64

EXHIBIT K



PREPARED FOR:
 DRAM - Additional Settlements
 1/10/14

PREPARED BY:
 Robin Niemiec

PROPOSAL	Estimated Number of Checks	664
SUMMARY	Project Cost	
	Distribution and Tax Reporting	\$3,749
	Fees	\$25,400
	Expenses	\$5,820
	Total Project Cost	\$34,969

▲ Distribution and Tax Reporting

Print Award Checks	664	Checks	1.5	996
Postage - Award Checks	664	Checks	0.44	292
Check Processing Fee	664	Checks	0.20	133
Undeliverable Trace Processing	200	Checks	3	500
Print Check Reissues	1	One Time Fee	500	500
Postage - Check Reissues	200	Checks	0.44	88
Processing Fee - Check Reissues	200	Checks	0.20	40
Monthly Bank Account Fee	6	Months	200	1,200
SUBTOTAL				\$3,749

▲ Fees

Project Management - blended rates	100	Hours	165	16,500
Staff Support	25	Hours	100	2,500
Technical Support - blended rates	40	Hours	160	6,400
SUBTOTAL				\$25,400

▲ Expenses

Post Office Box	1	Year	1,070	1,070
Monthly Website Maintenance/Hosting	6	Months	275	1,650
Misc. (storage, shredding, copies, faxes, etc.)	6	Months	100	600
Other Charges and Out-of-pocket Costs				2,500
SUBTOTAL				\$5,820

Total Estimated Cost **\$34,969**